



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

Russell L. Hirschhorn
Member of the Firm
d +1.212.969.3286
f 212.969.2900
rhirschhorn@proskauer.com
www.proskauer.com

May 13, 2022

By ECF and Email

The Honorable Mary Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: <u>6/29/2022</u>

Re: *Pecou v. Bessemer Trust Company et al.*, Case No. 22-cv-1019-MKV (S.D.N.Y.)

Dear Judge Vyskocil:

We represent Defendants Bessemer Trust Company (“Bessemer”) and the Profit-Sharing Plan Committee of Bessemer Trust Company (collectively, “Defendants”) in the above-referenced action.

Pursuant to Section 9 of Your Honor’s Individual Rules of Practice in Civil Cases, Defendants respectfully request that the Court accept redacted versions of Exhibits D and E to the Declaration of Matthew Toglia that were filed earlier today in support of Defendants’ Motion to Dismiss. We also have filed contemporaneously herewith, under seal, Mr. Toglia’s Declaration and Exhibits D and E thereto, highlighting the proposed redactions. Defendants request to redact sensitive, non-public business information related to the consideration Plaintiff Jubril Pecou received in connection with his separation from a Bessemer affiliate. In addition, Plaintiff requested that his home address be redacted for privacy reasons. These proposed redactions are limited to what is necessary to protect the parties’ interests in keeping this information confidential. *See, e.g., City of Almaty, Kazakhstan v. Ablyazov*, No. 15-cv-5345, 2021 WL 1177737, at *3 (S.D.N.Y. Mar. 29, 2021) (permitting redaction of individual’s home address in light of “[c]ompelling privacy interests”); *Navar v. Walsh Constr. Co. II, LLC*, No. 18-cv-10476, 2020 WL 7043067, at *1 (S.D.N.Y. Dec. 1, 2020) (granting motion to redact filed versions of separation agreement and general release as “necessary to prevent the unauthorized dissemination of confidential business information”); *see also* S.D.N.Y. Case No. 18-cv-10476, ECF No. 147 (letter to Judge Schofield identifying redactions).



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We thank the Court for its consideration of this request.

Respectfully,

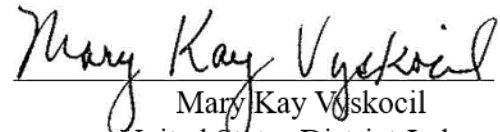
/s/ Russell L. Hirschhorn

Russell L. Hirschhorn

cc: All counsel of record

Granted. SO ORDERED.

Date: 6/29/2022
New York, New York



Mary Kay Vyskocil
United States District Judge